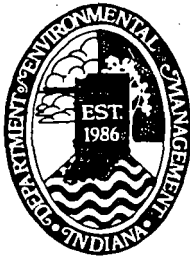


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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

February 7, 1989

105 South Meridian Street

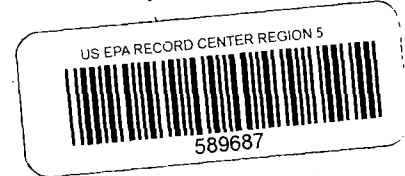
P.O. Box 6015

Indianapolis 46206-6015

Telephone 317-232-8603

VIA CERTIFIED MAIL

P 825 217 990



Mr. Jack Lane
Lane Restoration
4600 Bluff Road
Indianapolis, Indiana 46217

Re: Closure of McKinley-Thompson Landfill
3302 South Harding Street
Marion County

Dear Mr. Lane:

On January 11, 1989, Mr. Timothy Hotz of this office and Mr. David Foster of the Indianapolis Air Pollution Control Division inspected the above-referenced site. The inspection (copy enclosed) revealed that the fly ash and lime sludge which had been disposed of at the site for several years has not been properly covered in accordance with Rule 329 IAC 2. It is our understanding that the fly ash and lime sludge are no longer being accepted at the site.

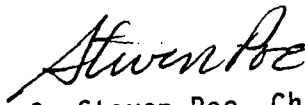
Therefore, all areas receiving lime sludge or fly ash must have a two foot clay type soil final cover applied and graded by May 1, 1989. Vegetation on this same area is to be established by May 15, 1989. A follow-up inspection will be conducted to determine compliance. Failure to comply with the provisions of this notice will subject you to legal action by the State of Indiana.

If you desire to continue using any of this area for storage and/or disposal of dirt, rock, brick or concrete, the Indiana Solid Waste disposal regulations do not prohibit such activity. However, during the inspection of January 11, 1989, there was observed a small amount of household trash disposed of at the site. In order to stop this kind of activity, the site must be monitored very closely or vehicle access restricted at all times.

Mr. Jack Lane
Page 2

If you have any questions, please feel free to contact Mr. Timothy Hotz or me at this office at AC 317/243-7205.

Very truly yours,



C. Steven Poe, Chief
Facility Inspection Section-South
Solid Waste Management Branch
Solid and Hazardous Waste Management

TH/lea

Enclosure

cc: Marion County Health Department
Mr. David Foster, Indianapolis Air Pollution Control Division



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

105 South Meridian Street

P.O. Box 6015

Indianapolis 46206-6015

Telephone 317-232-8603

Mr. Hak Cho
U.S. EPA Region V
230 South Dearborn Street
Chicago, Illinois 60604

January 19, 1989

Re: Land Disposal Withdrawal
Lane Restoration
(a/k/a McKinley-Thompson Landfill)
Indianapolis, Indiana
IND 980590673

Dear Mr. Cho:

On July 11, 1988, the Indiana Department of Environmental Management received a letter from the above mentioned facility requesting a withdrawal of their Part A Permit Application. Staff conducted a review of this request and of the facility file and determined that the site is not regulated under RCRA, since any potentially hazardous waste would have been disposed of prior to November 19, 1980, and is therefore not regulated, and eligible for withdrawal.

It is the opinion of this office, based on the information in our file that the facility is not required at this time to have a hazardous waste permit.

If a response is not received within thirty (30) days, we will assume you are in agreement with our decision and proceed with withdrawal.

If you have any questions regarding this matter, please contact Mr. Floyd H. Hertweck, at AC 317/232-3264.

Very truly yours,

Thomas E. Linson, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

FRH/sac

cc: Mr. Bernie Orenstein, U.S. EPA Region V
Mr. Vic Windle
Mr. James Hunt
Mr. Dennis Zawodni
Mr. Harry Atkinson
Mr. Dan Magoun

An Equal Opportunity Employer

File: McKinley Thompson Dump
Marion Co.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HE-12

NOV 06 1987

To whom it may concern:

The purpose of this letter is to introduce Nancy Kelly and David O'Neill of ICAIR Life Systems Inc. Life Systems has been contracted by the United States Environmental Protection Agency (U.S. EPA) to investigate the McKinley-Thompson (Lane) Landfill site located in Indianapolis, Indiana.

The U.S. EPA requests access for Life Systems Inc., to any records or files you may have that relate to the above referenced site. The contractor would then copy relevant records and photographs that document activities at the site.

The contractor, as a part of their tasks, would also like to conduct interviews with persons knowledgeable about the McKinley-Thompson Landfill Site.

Your cooperation in this matter is greatly appreciated. If you have any questions please Mr. Bruce Pumphrey of my staff at (312) 886-9493.

Sincerely yours,

Oliver Warnsley, Chief
Responsible Party Unit

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SUMMARY
Events of McKinley-Thompson Restoration
and Belmont STP Lagoon Disposal Project

- 1- 9/14/77 - Lane Application for Lagoon 1 and 2. Reference made to clay-type material.
- (DM) 2- 9/22/77 - Memo of meeting of 9/13/77. Reference to dried sludge. No objection offered by staff.
- (DDL) 3- 9/30/77 - Memo by D. D. Lamm referencing telephone call from Mike Robson-identifies material as sludge!! Not clay-type soil.
- 4- 9/29/77 - Letter from Mike Robson "certain types of solid sludge material" removed from "ash" lagoons.
- (DM) 5- 11/4/77 - Memo by Dan Magoun references site inspection of Belmont STP inspected-"sludge" which "was observed to be quite dry and did appear to shed water."
- (DM) 6- 11/16/77 - Memo by Dan Magoun-references desirability of project-"proposal is not only acceptable, if adhered to, but would vastly improve an already environmentally unacceptable situation..."
- (BHP) 7- 12/7/77 - Approval letter by Oral Hert for Lagoons 1 and 2. References "STP sludge" and lime fly ash barrier. Also, Condition #2 refers to "proposal material", only.
- (DM) 8- 12/13/77 - Inspection sheet by Dan Magoun. Reference to "no sludge has been deposited."
- (DM) 9- 1/11/78 - Inspection sheet by Dan Magoun references progress of lime, fly ash application. No reference to sludge.
- (DM) 10- 1/24/78 - Memo by Dan Magoun-references progress of renovation project. Speaks of "sludge from the dried beds at Belmont STP."
- (DM) 11- 2/14/78 - Inspection sheet by Dan Magoun-references sludge stockpiled on 1/2 of site, 5-6 feet high.
- (GO) 12- 4/7/78 - Inspection sheet by George Oliver-references noncompliance by not covering sludge with lime-fly ash.
- (DM) 13- 4/24/78 - Memo by Dan Magoun-references additional sludge disposal from Lagoons 3-10. Application for new lagoons and compliance of Lagoons 1 and 2 required first.
- 14- 4/27/78 - Letter from Jack Lane-references proposal for Lagoons 3-10, excluding 6. Liquid sludge pumped off and

forwarded to Boone County. Heavy fraction in bottom will be bulldozed into piles and loaded. "Much of the clay originally used as a liner in the bottom and sides of the lagoon will be bulldozed in and mixed."

- (DM) 15- 5/10/78 - Memo by Dan Magoun-references discussion with Jack Lane and inspection of site. Mr. Lane identified clay content of new sludge potential increases work ability. Recommendation by Dan Magoun to approve proposal for Lagoons 3-10, excluding 6.
- (GPD) 16- 6/15/78 - Memo by Guinn Doyle-references meeting with Jack Lane in regards to lack of available fly ash. Lamm and Doyle observed site and noted improvement of general appearance.
- 17- 7/28/78 - Letter from Jack Lane requesting approval to dispose of "sludge" from Lagoon 4 only.
- (GPD) 18- 8/9/78 - Approval letter from O. H. Hert for "sludge from Lagoon 4." Condition #8 refers to "approved plans be adhered to." Letter also references "using the sludge and dirt mixture."
- 19- Letter from Jack Lane transmitting Lagoon 9 analyses and request to "remove this sludge and dispose of it using criteria in 8/9/78 approval letter."
- (GPD) 20- 9/18/78 - Approval letter from O. H. Hert for Lagoon 9-reference to 8/9/78 letter conditions.
- 21- 9/19/78 - Letter from Jack Lane requesting approval to utilize "Area 1" for "solid sludge" disposal.
- 22- 9/25/78 - Letter from Jack Lane and supplemental proposal submitted by M. Finton. References lagoon bottoms and low cyanide content. Reference is made to ISBH reluctance to approve project. Summary change #3 on page 4 references "That all previous requirements as previously specified will be adhered to."
- (GO) 23- 9/21/78 - Inspection by George Oliver-refers to "sludge dumped and pushed into 2' to 4' layers."
- (GPD) 24- 10/12/78 - Approval letter from O. H. Hert for "Area #1" and "dirt from Lagoons 3, 5, 7 and 10." (MAILED?)
- (GPD) 25- 10/24/78 - Approval letter from O. H. Hert for "dirt/sludge material from Lagoons 3, 5, 7, 8 and 10." Reference to 8/9/78 letter conditions.
- (GO) 26- 11/10/78 - Inspection by George Oliver-"daily operation is satisfactory."

- (GO) 27- 11/27/78 - Inspection by George Oliver reference to filling of Area #1.
- (DDL) 28- 12/13/78 - Memo by David Lamm referencing quantities of sludges hauled to site. 80-93% of Lagoons 3 and 4 hauled to McKinley-Thompson Revocation site.
- (JME) 29- 1/22/79 - Letter from O. H. Hert to "stop depositing sludge from the Belmont STP." Reference to "sludge/dirt mixture from the interface of the sludge and lagoon bottoms."
- (GO) 30- 1/26/79 - Inspection sheet by George Oliver-reference "Lagoon 3 is deposited on-site" and "no operational problems evident."
- (GO) 31- 1/29/79 - Inspection sheet by George Oliver referencing "sludge has been deposited today."
- 32- 1/31/79 - Letter from Jack Lane in response to O. H. Hert letter of 1/22/79. Reference original approval letter of 12/7/77 rather than letter of 8/9/78. Also reference to "the material has been solid sludge and interface material, clay and sand, from the sides and bottoms of the lagoons."
- (GPD) 33- 2/2/79 - Approval letter from O. H. Hert for "sludge and sludge/dirt mixture remaining in Lagoon 3." Also confirms meeting of 1/31/79 with City, Tousley-Bixler, Technosolve and Lane. Lagoon 7 "to be disposed of ...in manner previously approved and not at McKinley-Thompson site."
- 34- 2/9/79 - Memo from Randy Vandegrift, WPC referencing inspection of 1/29/79 and improper handling of sludge. Memo reference to "upper 10-12 feet of sludge....being landfilled at McKinley-Thompson." A second operation references dredging of lagoon bottoms" (lower two inches of sludge mixed with subsoil) and sidewalls....being landfilled on municipal property."
- 35- 2/13/79 - Dave Hoppock letter acknowledging O. H. Hert letter 2/2/79. Also, "it is our understanding that the volume of the lagoon of the sludge/soil interface is not to exceed 10% of the actual volume of sludge in Lagoon 7."
- (GO) 36- 2/28/79 - Memo by George Oliver-reference to meeting with all parties to discuss unapproved sludge disposal. Reference is made to a clarification of definitions and what sludge/soil interface means. Reference is also made to disposal of sludge in Lagoon 3 if mixed with fly ash at time of disposal.
- (GO) 36a- 2/28/79 - Memo by George Oliver observing the loading of 4-6 feet of sludge in trucks from Lagoon 3 and hauled to McKinley-Thompson site on 1/26/79 and 1/29/79.

- (GO) 37- 5/17/79 - Inspection sheet by George Oliver-referencing inactivity of site and need for site completion per plans.
- (GO) 38- 5/18/79 - Inspection sheet by George Oliver-references a large area of exposed sludge and site still smoldering.
- 39- 6/13/79 - Memo from Reid, Quebe, Allison, Wilcox (RQAW). Reference meeting of ISBH, EPA, USGS, and city to discuss possibility of evaluating groundwater around the McKinley-Thompson site.
- 40- 6/19/79 - Letter from RQAW transmitting proposed leachate study at McKinley-Thompson site.
- (GO) 41- 6/27/79 - Inspection sheet by George Oliver referencing grading of site in preparation for final cover. No detection of smoldering.
- (GO) 42- 7/17/79 - Inspection sheet by George Oliver referencing minimal change in site status. No smoke seen.
- 43- 9/19/79 - Memo from RQAW reference meeting with EPA, George Oliver, RQAW, Tousley-Bixler and Jack Lane. Background activity at site and planned leachate study discussed.
- (GO) 44- 9/27/79 - Memo from George Oliver references 9/13/79 meeting, same as #43 above. George Oliver did mention additional sludge approval was not likely.
- 45- 9/27/79 - Letter from RQAW revising memo of 9/19/79, item #43 above.
- 46- 10/15/79 - Letter from Mike Robson, Indianapolis, to Greg Vanderlaan to acknowledge submission of RQAW proposal for leachate study.
- (HH) 47- 10/29/79 - Summation letter by Hugh Hazelwood outlining position of ISBH as to what was approved for disposal at McKinley-Thompson Renovation site.
- (DB) 48- 11/9/79 - Inspection sheet by Dave Brown-references application of final cover "soil" and grading.
- (DB) 49- 1/22/80 - Inspection sheet by Dave Brown-referencing continued progress towards "final cover soil."
- 50- 4/30/80 - Letter from RQAW proposing a meeting to discuss leachate study results.
- 51- 1/12/81 - Submission of leachate study by RQAW called an Environmental Impact Assessment (EIA).

- (DB) 52- 3/3/81 - Inspection sheet by Dave Brown referencing only fly ash being deposited on-site.
- (BHP) 53- 3/12/81 - Letter from O. H. Hert to R. Rippel, Indianapolis DPW referencing leachate study results compiled by RQAW in which "no significant environmental threat" was identified. Also, Lagoon C, Belmont STP, was denied for approval to be landfilled at McKinley-Thompson site.

DBM/sck
sck m/l 9/19/83